

Member Privacy Notice

1. Introduction and General Terms

- a. This Privacy Notice sets out how Grosvenor West End Properties, 70 Grosvenor Street, London, W1K 3JP, company number 00956235 (“**Owner**”) named in your Membership Agreement, use and protect your personal information that you provide to us, or that is otherwise obtained or generated by us, in connection with the Membership Agreement. For the purposes of this Privacy Notice (unless expressly stated, or the context requires, otherwise), ‘**we**’, ‘**us**’ and ‘**our**’ refers to the Owner and ‘**you**’ refers to you the Member.
- b. This Privacy Notice explains the following:
 - what personal information we may collect from you;
 - how we keep your personal information safe;
 - what we may use your personal information for;
 - who we may share your personal information with; and
 - your rights regarding your personal information.
- c. The Owner is the data controller in respect of your personal information for the purposes of applicable data protection legislation.

2. Legal ground for processing personal information

- a. We will process personal information relating to you (except for marketing purposes (see section 2b below)) on the ground that such processing is necessary to: (i) further our legitimate interest in the effective administration and management of the Membership Agreement and/or (ii) comply with our legal obligations, including those obligations relating to anti-money laundering..
- b. We may also process personal information relating to you in order to send you marketing communications about news, events, products and services that we believe may be of interest to you, provided we have received your consent to do so. You may withdraw such consent at any time and choose not to receive such marketing communications from us by either selecting the unsubscribe option at the bottom of each communication that we send to you or by contacting us using the details in section 9.

3. Personal information we may process about you

a. How do we collect personal information about you?

We collect personal information that you provide to us or which is provided to us on your behalf by your representatives or third parties such as legal advisors, managing agents, relocation agent or yourself in each case in relation to the Membership Agreement. You do not have to provide any personal information that we request from you, but it may not be possible for us to effectively administer and manage the Membership Agreement (or grant you the Membership Agreement at all) if that personal information is not provided.

b. What types of personal information may we process about you?

We may process any or all of the following personal information that relates to you:

- Your name, your email address, postal address, telephone and mobile number;
- your address
- your bank account details
- your photograph (for your Membership card)
- identifiers from your passport, driving licence or other ID card; and
- details of the products and services that you specify in your marketing preferences, provided we have received your consent to do so (see section 2b)
- CCTV images while entering or leaving the premises
- details of your Guests who may use the premises to monitor access

4. Keeping your personal information safe

a. Where the personal information is held

- We store your personal information on our property management software system, Yardi Voyager, internal electronic file storage and Outlook.
- Systems we use is secure and comply with industry standards, so as to protect your personal data from unauthorised access. Access to our systems is limited to representatives of the Owner and the Operator respectively, as well as certain of our service providers (see section 6).

b. Retention of your personal information

For audit and financial reasons, we will hold your personal information on our systems for 3 years following the date on which the Membership Agreement terminates or expires. CCTV images are held for 30 days. We may continue to hold your personal information for a longer period if required to do so by applicable law.

5. What we may process your personal information for

We process your personal information for the following purposes:

- carrying out background checks relating to you prior to you entering into the Membership Agreement (including anti-money laundering, financial and credit checks);
- managing and administering the Membership Agreement and the property to which the Membership Agreement relates, including the billing of sums payable under the Membership Agreement
- carrying out our obligations under the Membership Agreement, including the refunding of the appropriate proportion of your deposit on the termination or expiry of the Membership Agreement
- enforcing the terms of the Membership Agreement
- notifying you about changes to the Membership Agreement
- arranging our access to your property as and when required, including where our access is required in order for us to comply with our legal obligations;
- sending you marketing communications about news and events that we believe may be of interest to you, provided we have received your consent to do so (see section 2b);
- complying with any applicable present or future law, rule, regulation, guidance or directive, and complying with any applicable industry or professional rules and regulations or any applicable voluntary codes;
- complying with demands or requests made by local and foreign regulators, governments and law enforcement authorities, and complying with any subpoena or court process, or in connection with any litigation; and
- activities connected with any sale, merger, acquisition, disposal, recognition or similar change of our business.

6. Who we may share your personal information with

- a. We may share your personal information with any of the following recipients as may be necessary or desirable for the purposes described in section 5:
- The Arterial Group Ltd, the Operator will collect and process your personal data on the Owner's behalf in order to provide the Services and to undertake various administrative activities in relation to the Services.
 - other members of our company groups and their respective employees;
 - our service providers, including referencing and credit check companies, legal and financial advisors, managing agents, management surveyors, insurance brokers, debt recovery agents and hosting service providers (such as Yardi and Reapit)
 - local and foreign regulators, governments and law enforcement authorities;
 - local and foreign courts, tribunals and arbitrators, other judicial committees and enactments of laws; and

- persons connected with any sale, merger, acquisition, disposal, reorganisation or similar change to our business (including any potential or actual purchaser or that business and that purchaser's advisors).
- b. All third parties to whom we transfer personal information relating to you will be under an obligation to protect the confidentiality and security of that personal information.

7. Your rights regarding the personal information you provide to us

The accuracy of the personal information we hold about you is important to us. Under applicable data protection legislation you have rights concerning your personal information.

- You have a right to correct any inaccurate or incomplete personal information we hold on you. You have a right to receive a copy of the personal information we hold on you, which we must provide to you in a structured, commonly-used and machine-readable format. You have a right to require us to stop or to restrict our processing of your personal information only where possible . You have a right to require the erasure of personal information we hold on you once it is no longer necessary in relation to the purposes for which the personal information was collected or is being processed.
- Please contact us if you wish to exercise any of these rights using the details in section 9.
- If you have a complaint about how we manage your personal information please contact us. Our contact details are in section 9. If you are still not satisfied after going through our internal complaints procedure you can complain to The Information Commissioner's Office by telephone on 0303 123 1113 or through the following link: <https://ico.org.uk/global/contact-us/email/>

8. Changes to this Privacy Notice

We will review and may update our Privacy Notice from time to time. We will provide you with a copy of this Privacy Notice when you first become a member with us. All important changes made to our Privacy Notice will be notified to you by email.

This Privacy Notice was last reviewed and updated in May 2020.

9. Contact

If you have any questions, comments or requests regarding any aspect of this Privacy Notice, please do not hesitate to contact us on behalf of the Owner at:

By email: dataprotectionGBI@grosvenor.com